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Attorneys for Plaintiff California Sportfishing Protection Alliance

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIA SPORTFISHING
 PROTECTION ALLIANCE, a non-profit
 corporation;

Plaintiff,

vs.

GEORGIA-PACIFIC GYPSUM LLC, a
 Delaware limited liability company;
 GEORGIA-PACIFIC BUILDING
 PRODUCTS LLC, a Delaware limited
 liability company; RICK TURNER, an
 individual; MANOJ MATHUR, an
 individual; ROBERT CYPHERS, an
 individual; JEREMIAH DAVIS, an
 individual; MICHAEL WOODY, an
 individual; FRED CURCIO, an
 individual,

Defendants.

Case No. 3:12-CV-06274-SI

STIPULATION TO CONTINUE CASE
 MANAGEMENT SCHEDULE;
 DECLARATION OF EMILY BRAND;
~~PROPOSED~~ ORDER [Civil L.R. 16-2(d)]

Plaintiff California Sportfishing Protection Alliance (“CSPA”) together with
 Defendants Georgia-Pacific Gypsum LLC, Georgia-Pacific Building Products LLC,
 Robert Cyphers, Jeremiah Davis, Michael Woody, Fred Curcio, Rick Turner and
 Manoj Mathur hereby stipulate and move to continue the remaining case
 management schedule dates set in the Order dated December 11, 2012 (Court Doc
 #3) and amended by the Case Management Conference Order (Court Doc #8) to be

continued by a period of thirty (30) days.

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Date: February 28, 2013

LAW OFFICES OF ANDREW L. PACKARD

/s/ Emily J. Brand

Emily J. Brand

Attorneys for Plaintiff

California Sportfishing Protection Alliance

Date: February 28, 2013

COX CASTLE & NICHOLSON LLP

/s/ Robert P. Doty

Robert P. Doty

Attorneys for Defendants

Georgia-Pacific Gypsum LLC, et al.

DECLARATION OF EMILY BRAND

1. I am an attorney for Plaintiff California Sportfishing Protection Alliance, herein.
2. This action is a complaint for declaratory and injunctive relief and civil penalties brought against Defendants Georgia-Pacific Gypsum LLC, Georgia-Pacific Building Products LLC, Robert Cyphers, Jeremiah Davis, Michael Woody, Fred Curcio, Rick Turner and Manoj Mathur ("Defendants"), for current and ongoing violations of the Clean Water Act, 33 U.S.C. § 1251 to § 1387. The action was filed on December 11, 2012.
3. Plaintiff has not served Defendants at this time.
4. The parties are in active negotiations to settle the matter and hope to reach a complete resolution of this matter soon. Plaintiff has presented Defendants with a settlement proposal and Defendants have provided substantive comments on this agreement.
5. The parties agree that it is in their mutual best interests to request a short continuation of all Court deadlines to allow the parties to continue the settlement negotiations.
6. I am therefore requesting all current deadlines be extended thirty days, to allow Plaintiff and Defendants to come to a settlement agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in Berkeley, CA on February 28, 2013.

Dated: 2/28/2013

Law Offices of Andrew L. Packard

By: /s/ Emily J. Brand
Emily J. Brand
Attorneys for Plaintiff

[PROPOSED ORDER]

GOOD CAUSE APPEARING, it is hereby, ORDERED, that the deadlines set forth in the Clerk's Notice Setting Case Management Conference be extended as follows:

Last day to file Rule 26(f) Report, complete initial disclosures or state Objection and file Case Management Statement - April 5, 2013

Initial Case Management Conference - April 19, 2013

Dated: 3/6/13



UNITED STATES DISTRICT JUDGE